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Wednesday, August 28, 2024

**Via Electronic Filing and E-Mail [chambersnydeseibel@nysd.uscourts.gov](mailto:chambersnydeseibel@nysd.uscourts.gov)**

Hon. Cathy Seibel  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: Request for Scheduling Conference  
Case No.: 7:23-cv-04533  
**Re: *Project Veritas, et al. v. James O'Keefe, et al.***

Dear Judge Seibel:

Undersigned counsel represents Defendants James O'Keefe and O'Keefe Media Group (together "Defendants") in the above-referenced litigation. Pursuant to §I(A) of Your Honor's Individual Practices, Defendants move the Court for a scheduling conference. Defendants have repeatedly requested dates for depositions of Plaintiffs' and their representatives, and only two dates in September and October have materialized despite three weeks of effort in this regard. Defendants would ask for this Court's assistance in causing depositions to be scheduled.

Thank you for your consideration and attention to this matter.

Regards,

Seldon J. Childers

SJC/adm

cc: counsel of record via CM/ECF